

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**JOSE GUZMAN**

**Case No.: Case No. 1:16-cv-03499-GBD**

**Plaintiff,**

**-against-**

**MEL S. HARRIS AND ASSOCIATES, LLC  
LR CREDIT 13, LLC  
MEL S. HARRIS  
DAVID WALDMAN  
KERRY H. LUTZ  
TODD FABACHER  
MICHAEL YOUNG  
SAMSERV, INC  
JOHN ANDINO  
WILLIAM MLOTOK**

**Defendants.**

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**DECLARATION OF AHMAD KESHAVARZ  
IN SUPPORT OF OBJECTION TO MAGISTRATE ORDER DENYING PLAINTIFF'S  
MOTION TO COMPEL**

I, Ahmad Keshavarz, declare under penalty of perjury, as provided or by the laws of the United States, 28 U.S.C. § 1746, that the following statements are true:

1. My name is Ahmad Keshavarz. I am of sound mind and capable of giving this declaration.
2. Attached as Exhibit A is a true and correct copy of Plaintiff's motion to compel SAMSERV.
3. Attached as Exhibit B is a true and correct copy of Defendant SAMSERV's opposition to motion to compel.
4. Attached as Exhibit C is a true and correct copy of transcript of hearing on motion to compel, with the exception of the redacting of the amount of a putative offer of judgment made by LRC. The reason for the redaction are comments by Magistrate Ellis (p. 6:10-17) suggesting

he did not wish the information to be disclosed to Judge Daniels (“Certainly I wouldn’t expect you to discuss that [offers of judgment] with -- before Judge Daniels...”)

5. Attached as Exhibit D is a true and correct copy of Plaintiff’s First-Amended Initial Disclosures.

6. Attached as Exhibit E is a true and correct copy of Plaintiff’s First-Amended Initial Disclosures.

7. Attached as Exhibit F is a true and correct copy of “Sykes III,” the order granting class certification.

Dated: Brooklyn, New York  
November 23, 2016

/s/

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Ahmad Keshavarz